ACTION MEMORANDUM

SUBJECT: ENFORCEMENT ACTION MEMORANDUM - Determination of Threat to Public Health and the Environment and Selection of a Time-Critical Removal Action at the N-Forcer Site in Dearborn, Wayne County, Michigan (Site ID #B55P)

FROM: Brian Kelly, On-Scene Coordinator
Emergency Response Section 1

TO: Richard C. Karl, Director
Superfund Division

THRU: Linda Nachowicz, Chief
Emergency Response Branch

I. PURPOSE

The purpose of this Memorandum is to document the determination: (1) of an imminent and substantial threat to public health, welfare, and (2) of the need to conduct a time-critical removal action to abate that threat on the railroad tracks adjacent to the former W.R. Grace facility at 14300 Henn Street, Dearborn, Michigan. The railroad tracks are owned by CSX Transportation, Inc. (CSXT). It is believed CSXT or its predecessor transported the asbestos-tainted vermiculite to the former W.R. Grace facility. Because the railroad track property contains contamination associated with the former W.R. Grace facility originally defined as the N-Forcer Site, the railroad tracks are now also considered part of that Site.

The proposed removal action is necessary to mitigate the immediate threat to public health posed by the presence of fibrous amphibole Libby Asbestos (LA) in all its forms. The LA contamination is the result of, but not limited to, expansion of LA-tainted vermiculite at the N-Forcer site and spills from rail transportation of that vermiculite.

The response action proposed will mitigate the threats by: identifying surface and subsurface areas contaminated with LA; and removing LA from surface and subsurface areas where the LA is present at levels above 1% or which may pose an inhalation hazard.

REGION 5 CORRESPONDENCE SIGN-OFF									
STAFF	Preparer	Section Secretary	Section Chief	Branch Secretary	Branch Chief	Division Secretary	Division Director	ORC	Regional Admin.
INITIAL									
DATE	5/4/05	5/11/05	5/4/05		5/10/05		5/17/05	5/13	5/16